



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

DEC 30 2019

REPLY TO THE ATTENTION OF

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Robert Szczesny, General Manager
Ferrous Processing and Trading - Pontiac Division
500 Collier Road
Auburn Hills, Michigan 48326

Re: Notice of Violation
Ferrous Processing and Trading - Pontiac Division
Auburn Hills, Michigan

Dear Mr. Szczesny:

The U.S. Environmental Protection Agency is issuing the enclosed Notice of Violation (NOV) to Ferrous Processing and Trading - Pontiac Division (you) under Section 113(a)(1) of the Clean Air Act, 42 U.S.C. § 7413(a)(1). As set forth in the NOV, we find that you are violating the Michigan State Implementation Plan at your Auburn Hills, Michigan facility.

Section 113 of the Clean Air Act gives us several enforcement options. These options include issuing an administrative compliance order, issuing an administrative penalty order and bringing a judicial civil or criminal action.

We are offering you an opportunity to confer with us about the violations alleged in the NOV. The conference will give you an opportunity to present information on the specific findings of violation, any efforts you have taken to comply and the steps you will take to prevent future violations. In addition, in order to make the conference more productive, we encourage you to submit to us information responsive to the NOV prior to the conference date.

Please plan for your facility's technical and management personnel to attend the conference to discuss compliance measures and commitments. You may have an attorney represent you at this conference.

The EPA contact in this matter is Virginia Galinsky. You may call her at (312) 353-2089 to request a conference. You should make the request within 10 calendar days following receipt of this letter. We should hold any conference within 30 calendar days following receipt of this letter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael D. Harris". The signature is fluid and cursive, with the first name "Michael" being more prominent than the last name "Harris".

Michael D. Harris
Division Director
Enforcement and Compliance Assurance Division

Enclosure


cc: Jenine Camilleri, Enforcement Unit Supervisor, Michigan EGLE
Joyce Zhu, Enforcement Unit District Supervisor, Michigan EGLE

- a. All fans, ducts and ripple boxes shall be inspected after each 8 hours of operation and cleaned when necessary.
- b. All cyclones shall be inspected after each 40 hours of operation and cleaned when necessary.
- c. A log book shall be maintained at the company office in which the hours of operation and all maintenance, repair and pollution control measures taken shall be recorded on a daily basis.

Violations

5. On July 9, 2018, EPA conducted an on-site inspection at FPT - Pontiac. During this inspection, the EPA inspector observed that the collection hood located after the shredder, which pulls particulate emissions to the primary fabric filter, was missing its sheet metal sides and was just an open metal frame, in violation of Special Condition 18 of the Facility's Permit (operation without a properly operating fabric collector).
6. On April 10, 2019, EPA sent a Request for Information to FPT - Pontiac pursuant to Section 114 of the Clean Air Act. Among other information requested, EPA requested the records required by Special Condition 19.c of the Facility's permit.
7. On June 1, 2019, FPT - Pontiac submitted its response to EPA's Request for Information.
8. The activity log provided by FPT - Pontiac in response to the request for the records covered January 2016 through March 2019. It does not identify any daily maintenance inspections or hours of operation, in violation of Special Condition 19 of the Facility's Permit. The log identifies causes of breakdowns of the shredder but does not have any record of maintenance on the cyclones or fabric filter and fails to mention the absence of sheet metal sides on the collection hood located after the shredder, in violation of Special Condition 19 of the Facility's Permit.

12/30/19
Date


Michael D. Harris
Division Director
Enforcement and Compliance Assurance
Division

CERTIFICATE OF MAILING

I certify that I sent a Notice of Violation, No. EPA-5-20-MI-01, by Certified Mail, Return

Receipt Requested, to:

Robert Szczesny, General Manager
Ferrous Processing and Trading - Pontiac Division
500 Collier Road
Auburn Hills, Michigan 48326

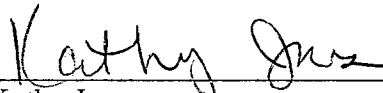
I also certify that I sent copies of the Notice of Violation by first-class mail to:

Lisa Carrol, Environmental Director
Ferrous Processing and Trading
9100 John Kronk
Detroit, Michigan 48210

Jenine Camilleri
Enforcement Unit Supervisor
Air Quality Division
Michigan Department of Environment Great Lakes and Energy (EGLE)
CamilleriJ@michigan.gov

Joyce Zhu
Enforcement Unit District Supervisor
Air Quality Division, Southeast District
Michigan Department of Environment Great Lakes and Energy (EGLE)
zhuj@michigan.gov

On the 31st day of January 2020.



Kathy Jones
Program Technician
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7019 0140 00007224304